

Exhibit 64

Page 1

1 UNITED STATES DISTRICT COURT
2 SOUTHERN DISTRICT OF NEW YORK

3 -----x
4 DONNA WOOD, et al, individually
5 and on behalf of all others
6 similarly situated,

7 Plaintiffs,
8 vs. 20 Civ. 2489 (LTS) (GWG)

9 MIKE BLOOMBERG 2020, INC.,
10 Defendant.

11 -----x

12
13 VIDEOTAPE DEPOSITION OF
14 BRIDGET LOGAN
15 VIA ZOOM VIDEOCONFERENCE

16 November 10, 2022
17 9:10 a.m. CT

18
19
20
21
22
23 Case No. 5548190

24 Reported by:

25 Maureen Ratto, RPR, CCR

<p>1 BRIDGET LOGAN</p> <p>2 Q. Going back to the first email</p> <p>3 where you said "I'm in" in this chain,</p> <p>4 this was sent on March 9th to Bridgette</p> <p>5 Logan and the subject line is Bloomberg</p> <p>6 Exit, did that "I'm in" language have</p> <p>7 anything to do with your participation in</p> <p>8 this lawsuit?</p> <p>9 A. I don't recall specifically</p> <p>10 that that's what that pertained to.</p> <p>11 Q. Sitting here today, do you</p> <p>12 have any recollection of what that</p> <p>13 pertained to?</p> <p>14 A. As I stated before, it looks</p> <p>15 like I went to the Facebook page. That's</p> <p>16 -- that's what I would assume that's for.</p> <p>17 Q. How did you first learn about</p> <p>18 this lawsuit?</p> <p>19 A. I don't recall the specifics.</p> <p>20 Q. Do you recall finding out</p> <p>21 about the existence of the lawsuit on</p> <p>22 your own or did somebody contact you to</p> <p>23 let you know about the existence of the</p> <p>24 lawsuit?</p> <p>25 A. I can safely say that there</p>	Page 30	Page 32
<p>1 BRIDGET LOGAN</p> <p>2 was an opportunity for the field</p> <p>3 organizers to get together and that there</p> <p>4 was conversations on that, having action</p> <p>5 against the campaign. I don't recall how</p> <p>6 I got specifically involved with it.</p> <p>7 Q. When did you first consult a</p> <p>8 lawyer about participating in this</p> <p>9 lawsuit?</p> <p>10 A. I didn't consult any lawyers.</p> <p>11 I believe that I was directed to whomever</p> <p>12 was going to handle the case on behalf of</p> <p>13 the field organizers. How I did that, I</p> <p>14 don't recall.</p> <p>15 Q. Do you recall who directed you</p> <p>16 to the lawyers?</p> <p>17 A. No, I do not.</p> <p>18 Q. Was it a field organizer?</p> <p>19 A. I don't recall.</p> <p>20 Q. Do you recall if a lawyer</p> <p>21 reached out to you or you reached out to</p> <p>22 the lawyer?</p> <p>23 A. I couldn't tell you which way</p> <p>24 it went.</p> <p>25 Q. Do you recall who the first</p>	Page 31	Page 33

<p>1 BRIDGET LOGAN</p> <p>2 Q. Did you use this resumé to</p> <p>3 apply for a job at the Bloomberg</p> <p>4 Campaign?</p> <p>5 A. I did.</p> <p>6 Q. Since creating this resumé</p> <p>7 have you updated it at all?</p> <p>8 A. No, I have not.</p> <p>9 Q. Looking at the resumé that you</p> <p>10 created, is this an accurate description</p> <p>11 of your educational and professional</p> <p>12 experience as of the date you created it?</p> <p>13 A. Yes, it is.</p> <p>14 Q. Under the Skills heading where</p> <p>15 you have about eight bullet points, is</p> <p>16 this an accurate description of your</p> <p>17 skill set?</p> <p>18 A. Yes.</p> <p>19 Q. Did you put this resumé</p> <p>20 together for the purpose of applying to</p> <p>21 the Bloomberg Campaign or were you</p> <p>22 otherwise putting your resumé together</p> <p>23 generally?</p> <p>24 A. I put it together for the</p> <p>25 Bloomberg Campaign, to apply.</p>	Page 34	<p>1 BRIDGET LOGAN</p> <p>2 your associate's degree?</p> <p>3 A. It was called Brown Institute</p> <p>4 at the time and then it turned into Brown</p> <p>5 College in Mendota Heights, Minnesota.</p> <p>6 Q. And when did you complete your</p> <p>7 associate's degree?</p> <p>8 A. I completed it in -- when was</p> <p>9 she born? -- 2001.</p> <p>10 Q. And how much college credit do</p> <p>11 you have beyond your associate's degree?</p> <p>12 A. I don't know the number of</p> <p>13 credits. I know I am shy of completing</p> <p>14 another associate's through a community</p> <p>15 college, which I don't know is on there</p> <p>16 or not.</p> <p>17 Q. Is that community college</p> <p>18 Minneapolis Community and Technical</p> <p>19 College?</p> <p>20 A. Correct.</p> <p>21 Q. Where do you currently work?</p> <p>22 A. I work at Minnetonka Title in</p> <p>23 Wayzata, Minnesota.</p> <p>24 Q. Is this also the company you</p> <p>25 worked at prior to joining the Bloomberg</p>	Page 36
<p>1 BRIDGET LOGAN</p> <p>2 Q. Did you have a prior version</p> <p>3 of your resumé before you created this</p> <p>4 one for the Bloomberg Campaign?</p> <p>5 A. Not that I can put my hands</p> <p>6 on.</p> <p>7 Q. What does that mean?</p> <p>8 A. I've had several jobs before</p> <p>9 the Bloomberg Campaign that I have</p> <p>10 created resumés for. I guess I'm</p> <p>11 anticipating a question of; do you have</p> <p>12 them? And maybe I shouldn't anticipate</p> <p>13 the question.</p> <p>14 Q. Do you have them?</p> <p>15 A. No, not that I can put my</p> <p>16 hands on.</p> <p>17 Q. Prior to creating this resumé,</p> <p>18 when was the last time before that that</p> <p>19 you recall making a resumé?</p> <p>20 A. In 2014.</p> <p>21 Q. How much college have you</p> <p>22 completed?</p> <p>23 A. I've completed an associate's,</p> <p>24 and then some college after that.</p> <p>25 Q. And where did you complete</p>	Page 35	<p>1 BRIDGET LOGAN</p> <p>2 Campaign?</p> <p>3 A. Correct.</p> <p>4 Q. How long have you worked at</p> <p>5 Minnetonka Title?</p> <p>6 A. Not counting the month and a</p> <p>7 half where I did not work there, I have</p> <p>8 worked there since January 2014, so going</p> <p>9 on nine years.</p> <p>10 Q. What kind of services does</p> <p>11 Minnetonka Title provide?</p> <p>12 A. Minnetonka is a title</p> <p>13 insurance company, so if you purchase or</p> <p>14 refinance your home you need to go</p> <p>15 through a title company to do that.</p> <p>16 That's what we do.</p> <p>17 Q. And what is your position?</p> <p>18 A. I am an administrative</p> <p>19 assistant/closing assistant to the two</p> <p>20 closers at the company.</p> <p>21 Q. And what are your job</p> <p>22 responsibilities in that position?</p> <p>23 A. A lot.</p> <p>24 Q. Can you describe them for me,</p> <p>25 please?</p>	Page 37

<p>1 BRIDGET LOGAN</p> <p>2 A. I am data entry, I answer the</p> <p>3 phones, I do the recording for our</p> <p>4 documents, I file, I send back mortgages,</p> <p>5 I answer questions related to any of the</p> <p>6 transactions going on for any and all</p> <p>7 agents. I am a little bit of everything</p> <p>8 in our office.</p> <p>9 Q. Is the job you currently hold</p> <p>10 the same job you had at Minnetonka prior</p> <p>11 to joining the Bloomberg Campaign?</p> <p>12 A. Yes, it is.</p> <p>13 Q. When you were putting this</p> <p>14 resumé together to apply for the</p> <p>15 Bloomberg Campaign, did you create it to</p> <p>16 reflect content that you believed would</p> <p>17 be relevant to the job you were applying</p> <p>18 for?</p> <p>19 A. I created it to show the most</p> <p>20 current employment that I had after the</p> <p>21 last, I don't know, four jobs. I don't</p> <p>22 like making resumés.</p> <p>23 Q. Did you think about whether</p> <p>24 the content would be relevant to the job</p> <p>25 you were seeking to get?</p>	Page 38	<p>1 BRIDGET LOGAN</p> <p>2 somewhere. I wish I could be more</p> <p>3 specific but...</p> <p>4 Q. Do you recall any details of</p> <p>5 that conversation? When it took place?</p> <p>6 Let's start there.</p> <p>7 A. I would say January of 2020 is</p> <p>8 when the original conversation took</p> <p>9 place. It was probably at a bar and I was</p> <p>10 having some beers, which might make the</p> <p>11 memory fuzzy.</p> <p>12 Q. Were you drunk?</p> <p>13 A. No.</p> <p>14 Q. Do you have a sister named</p> <p>15 Heather Logan?</p> <p>16 A. I do.</p> <p>17 Q. Has Heather ever worked for</p> <p>18 any entities associated with</p> <p>19 Mr. Bloomberg?</p> <p>20 A. Yes.</p> <p>21 Q. And what entities are those?</p> <p>22 A. Bloomberg.</p> <p>23 Q. Bloomberg, the company?</p> <p>24 A. Bloomberg, the company, yes.</p> <p>25 Q. Do you mean Bloomberg LP?</p>	Page 40
<p>1 BRIDGET LOGAN</p> <p>2 A. Can you repeat the question?</p> <p>3 I'm sorry.</p> <p>4 MS. PHILION: Maureen, can you</p> <p>5 read the question back, please?</p> <p>6 (Pending question is read back</p> <p>7 by the reporter.)</p> <p>8 A. Did I think the content to be</p> <p>9 relevant to the job I was seeking? Is</p> <p>10 that a fair summary? Can you ask it in a</p> <p>11 different way?</p> <p>12 Q. Sure. When you were creating</p> <p>13 this resumé, did you think about</p> <p>14 including content that would be relevant</p> <p>15 to the job that you were seeking?</p> <p>16 A. I created content to reflect</p> <p>17 my skills.</p> <p>18 Q. How did you learn about the</p> <p>19 job at the Bloomberg Campaign?</p> <p>20 A. Good question. Word of mouth.</p> <p>21 I knew someone who knew about them</p> <p>22 hiring.</p> <p>23 Q. And who is that person?</p> <p>24 A. I don't recall. It was kind of</p> <p>25 like a conversation had with --</p>	Page 39	<p>1 BRIDGET LOGAN</p> <p>2 A. I don't -- I just know she</p> <p>3 worked in the Bloomberg office in New</p> <p>4 York.</p> <p>5 Q. Do you know where in New York</p> <p>6 the office was located?</p> <p>7 A. Manhattan.</p> <p>8 Q. Where in Manhattan?</p> <p>9 A. I don't know.</p> <p>10 Q. Does your sister currently</p> <p>11 work for a Bloomberg entity?</p> <p>12 A. No, not that I'm aware of.</p> <p>13 Q. When did she work for a</p> <p>14 Bloomberg entity?</p> <p>15 A. I don't know what year she</p> <p>16 started. I know she was there in 2019</p> <p>17 through 2021, maybe.</p> <p>18 Q. Did you learn of the Bloomberg</p> <p>19 Campaign job through your sister?</p> <p>20 A. No, I did not. However, I did</p> <p>21 ask her about it and asked her if she</p> <p>22 thought I would be a good fit.</p> <p>23 Q. And what did she say?</p> <p>24 A. She said yes.</p> <p>25 Q. Did she tell you why she</p>	Page 41

<p>1 BRIDGET LOGAN</p> <p>2 Q. Where was the St. Anthony</p> <p>3 office located?</p> <p>4 A. On a map it's really close to</p> <p>5 Minnesota.</p> <p>6 Q. Is it in Minneapolis, the city</p> <p>7 or is it outside the city?</p> <p>8 A. It's one of those, here is</p> <p>9 Minneapolis, here is St. Anthony, and</p> <p>10 then here is Minneapolis. It kind of sits</p> <p>11 in between the city.</p> <p>12 Q. Is St. Anthony considered an</p> <p>13 urban area?</p> <p>14 A. I think it's fair to say that.</p> <p>15 Q. Are you familiar with the term</p> <p>16 turf?</p> <p>17 A. In what context? I believe</p> <p>18 there is like several different ways to</p> <p>19 use it.</p> <p>20 Q. In the context of your job as</p> <p>21 a field organizer, did you hear the word</p> <p>22 turf being used?</p> <p>23 A. Possibly.</p> <p>24 Q. Do you have an understanding</p> <p>25 of what the word turf means in the</p>	Page 58	<p>1 BRIDGET LOGAN</p> <p>2 within our office picked a specific area.</p> <p>3 Q. And each of you had a</p> <p>4 different sub-district?</p> <p>5 A. Correct.</p> <p>6 Q. And your sub-district was in</p> <p>7 northeast Minnesota?</p> <p>8 A. That's the neighborhood. If I</p> <p>9 had a map I could show you specifically,</p> <p>10 but that was the neighborhood.</p> <p>11 Q. And what was your</p> <p>12 responsibility within that neighborhood?</p> <p>13 A. They wanted us to reach out to</p> <p>14 the state representative of that district</p> <p>15 to see if we could connect with them as a</p> <p>16 representative of the campaign. They</p> <p>17 wanted us to, if there were</p> <p>18 opportunities, to go and speak on behalf</p> <p>19 of the campaign, like a neighborhood</p> <p>20 organization or something like that, if</p> <p>21 we were aware of it, to see if they would</p> <p>22 allow the campaign to come and speak, we</p> <p>23 were that rep.</p> <p>24 Q. Any other responsibilities</p> <p>25 with respect to your sub-district?</p>	Page 60
<p>1 BRIDGET LOGAN</p> <p>2 context of political organizing?</p> <p>3 A. Yes.</p> <p>4 Q. And what does that mean to</p> <p>5 you?</p> <p>6 A. Turf is an area, you have a</p> <p>7 specific area that you are either</p> <p>8 assigned to or a part of.</p> <p>9 Q. Did you have a turf while you</p> <p>10 worked for the Bloomberg Campaign?</p> <p>11 A. I did.</p> <p>12 Q. What was that turf?</p> <p>13 A. So within our district, and we</p> <p>14 were District 5, there are sub-districts</p> <p>15 and we each picked a sub-district, for</p> <p>16 lack of a better terminology. And I had</p> <p>17 -- mine was in a neighborhood of part of</p> <p>18 Minneapolis, what they call northeast</p> <p>19 Minneapolis, not the whole thing but part</p> <p>20 of it.</p> <p>21 Q. When you say that you each</p> <p>22 picked sub-districts, are you referring</p> <p>23 to each field organizer in your turf</p> <p>24 selecting a sub-district?</p> <p>25 A. I can say the field organizers</p>	Page 59	<p>1 BRIDGET LOGAN</p> <p>2 A. Yes. You were encouraged to go</p> <p>3 and canvass there, canvassing meaning</p> <p>4 door to door, knocking on people's doors</p> <p>5 to talk to them about the campaign.</p> <p>6 Q. Any other responsibilities</p> <p>7 with respect to that sub-district?</p> <p>8 A. Not that I recall.</p> <p>9 Q. Did you select your</p> <p>10 sub-district?</p> <p>11 A. I did.</p> <p>12 Q. Why did you select northeast</p> <p>13 Minnesota as your sub-district?</p> <p>14 A. I don't recall having a</p> <p>15 specific reason. It is a neighborhood I'm</p> <p>16 familiar with more than others in</p> <p>17 Minnesota.</p> <p>18 Q. I believe you referred to your</p> <p>19 region as District 5 earlier. Is that</p> <p>20 District 5 for the Bloomberg Campaign?</p> <p>21 A. I think so.</p> <p>22 Q. Was District 5 the only office</p> <p>23 that you worked in while you were</p> <p>24 employed by the Bloomberg Campaign?</p> <p>25 A. No. Worked? That was my</p>	Page 61

16 (Pages 58 - 61)

<p>1 BRIDGET LOGAN 2 assigned campaign office. During the 3 weekend, what they call the Get Out The 4 Vote weekend prior to I did assist out of 5 the Hopkins office and I did assist out 6 of the Brooklyn Park office. 7 Q. I'm sorry. Could you repeat 8 that? 9 A. Brooklyn Park, Brooklyn Park, 10 Minnesota office, I think. I don't 11 remember where everybody was. 12 Q. How many days did you work out 13 of the Hopkins office? 14 A. Two. 15 Q. And how many days did you work 16 out of the Brooklyn Park office? 17 A. One. 18 Q. And the other days that you 19 worked for the campaign were all out of 20 the St. Anthony office? 21 A. Correct. 22 Q. When you were working out of 23 the Hopkins office, what were you doing 24 those two days? 25 A. I was canvassing and making</p>	Page 62	<p>1 BRIDGET LOGAN 2 office. 3 Q. Do you know anyone in the 4 Hopkins office? 5 A. Not by name anymore, no. 6 Q. When you were making phone 7 calls, were there other people in the 8 Hopkins office? 9 A. Yes. 10 Q. Did you have any direct 11 interaction with them or you were just 12 there for the purpose of making phone 13 calls? 14 A. I was just there to make my 15 phone calls. I might have talked to 16 people but I wasn't there to interact 17 with anybody but the phone. 18 Q. And I apologize if you already 19 told me this, but what two days were you 20 in the Hopkins office? I don't mean the 21 dates, I mean relative to your employment 22 with the campaign. 23 A. Near the end of the campaign. 24 It was called the Get Out The Vote 25 weekend. It's the weekend prior to the</p>	Page 64
<p>1 BRIDGET LOGAN 2 phone calls. 3 Q. Canvassing was out of the 4 office? When you were canvassing were you 5 physically in the office or were you out 6 in the field? 7 A. I was out in the field but we 8 -- our base was Hopkins if we needed to 9 come back or warm up or get something to 10 eat or something to drink. 11 Q. When you were -- 12 A. -- use the restroom. 13 Q. When you were canvassing -- 14 please finish. Are you finished? 15 A. Yeah. 16 Q. Just for purposes of the 17 transcript. 18 A. Yeah. 19 Q. So when you were canvassing in 20 Hopkins, did you canvass on your own? 21 A. I did. 22 Q. And when you made phone calls, 23 where did you make those phone calls 24 from? 25 A. I made them out of the Hopkins</p>	Page 63	<p>1 BRIDGET LOGAN 2 primary. 3 Q. You said you worked one day in 4 the Brooklyn Park office. When did you 5 work in that office? 6 A. That was Tuesday, primary day. 7 Q. Super Tuesday? 8 A. Thank you. Super Tuesday. 9 Q. And what were you doing on 10 Super Tuesday? 11 A. On that day, canvassing. 12 Q. Did you canvass on your own? 13 A. Yes. 14 Q. And then for the rest of your 15 employment with the Bloomberg Campaign 16 you worked out of the St. Anthony office? 17 A. Correct. 18 Q. Other than Sina and the RODs 19 that you -- excuse me -- the field 20 organizers that you identified earlier. 21 -- withdrawn. Let me start over. 22 Other than Sina and the other 23 field organizers that you identified 24 earlier, did anybody else work out of the 25 Minnesota office?</p>	Page 65

<p>1 BRIDGET LOGAN</p> <p>2 A. You mean my office, the St.</p> <p>3 Anthony one?</p> <p>4 Q. The St. Anthony office.</p> <p>5 A. I wouldn't use the term</p> <p>6 "work". Were there other people there</p> <p>7 from other campaign offices? Yes. Did</p> <p>8 they stay there to do work? No.</p> <p>9 Q. What were they there to do?</p> <p>10 A. It's unclear. Pick up</p> <p>11 something, campaign materials, talk to</p> <p>12 Sina.</p> <p>13 Q. When did you first start with</p> <p>14 the campaign?</p> <p>15 A. I believe that date was</p> <p>16 February 3rd.</p> <p>17 Q. Was that a little late</p> <p>18 compared to other field organizers in</p> <p>19 your office?</p> <p>20 A. Not that I'm aware of. I don't</p> <p>21 know. We all -- as far as I know, we all</p> <p>22 had orientation on the same day.</p> <p>23 Q. When you first started with</p> <p>24 the campaign, was the St. Anthony office</p> <p>25 already open?</p>	Page 66	<p>1 BRIDGET LOGAN</p> <p>2 A. Great. Okay.</p> <p>3 VIDEOGRAPHER: Very well.</p> <p>4 We're going off the record at 10:21</p> <p>5 Central Time.</p> <p>6 (Recess is taken.)</p> <p>7 VIDEOGRAPHER: We are going</p> <p>8 back on the record at 10:31 a.m.</p> <p>9 Central Time.</p> <p>10 Q. Ms. Logan, you testified</p> <p>11 earlier that your first day of work for</p> <p>12 the Bloomberg Campaign was February 3rd;</p> <p>13 is that correct?</p> <p>14 A. Yes.</p> <p>15 Q. Did you attend field organizer</p> <p>16 training on your first day of work?</p> <p>17 A. I did.</p> <p>18 Q. Do you recall how long field</p> <p>19 organizer training was?</p> <p>20 A. All day.</p> <p>21 Q. Who else did you attend</p> <p>22 organizing training with?</p> <p>23 A. The other field organizers for</p> <p>24 the Minnesota offices and the director of</p> <p>25 the campaign for the state made</p>	Page 68
<p>1 BRIDGET LOGAN</p> <p>2 A. I don't know.</p> <p>3 Q. Do you recall working</p> <p>4 somewhere other than the St. Anthony</p> <p>5 office when you started with the</p> <p>6 campaign?</p> <p>7 A. Orientation was held at the</p> <p>8 campaign headquarters and then we were</p> <p>9 assigned an office.</p> <p>10 Q. When you say "campaign</p> <p>11 headquarters", you mean the Minnesota</p> <p>12 headquarters for the campaign?</p> <p>13 A. Yes.</p> <p>14 Q. Okay. So we've been going for</p> <p>15 a little bit more than an hour. So if</p> <p>16 it's okay with you, I'm going to take</p> <p>17 about a ten minute break and we'll all</p> <p>18 reconvene at 11:30.</p> <p>19 A. Does this just stay on then?</p> <p>20 Q. So I would recommend that you</p> <p>21 mute yourself and you turn your video off</p> <p>22 and then we're going to go off the record</p> <p>23 and then when we come back you'll turn</p> <p>24 your video on and unmute yourself. I</p> <p>25 would not disconnect.</p>	Page 67	<p>1 BRIDGET LOGAN</p> <p>2 appearance. Otherwise, the training was</p> <p>3 led by a gentleman by the name of Aaron.</p> <p>4 And if I had his last name in front of me</p> <p>5 I could say yeah, that's his last name. I</p> <p>6 don't recall his last name off the top of</p> <p>7 my head.</p> <p>8 Q. Was it Aaron Rothe?</p> <p>9 A. Yes. Thank you.</p> <p>10 Q. And the director of the</p> <p>11 campaign for the state, do you recall</p> <p>12 that person's name?</p> <p>13 A. Michael. I don't recall his</p> <p>14 last name.</p> <p>15 MS. PHILION: Duane, could you</p> <p>16 please pull up tab 48 for me,</p> <p>17 please?</p> <p>18 (Logan Exhibit 3, Orientation</p> <p>19 email dated January 31, 2020, Bates</p> <p>20 P005727 was received and marked on</p> <p>21 this date for identification.)</p> <p>22 CONCIERGE: Logan 3 has been</p> <p>23 marked.</p> <p>24 Q. Ms. Logan, can you please take</p> <p>25 a look at the document that's been marked</p>	Page 69

<p>1 BRIDGET LOGAN 2 you wrote "my chair? 3 A. That's a good question. "I 4 reached out to my chair today via email 5 and didn't hear back from him today." 6 You know, it might have 7 related to a conversation we had where 8 that terminology was used. I don't know 9 who that chair is supposed to be. 10 Q. Do you know if you were 11 referring to someone in the local 12 community or someone within the Bloomberg 13 Campaign? 14 A. It wouldn't have been within 15 the campaign. 16 Q. So someone like a community 17 leader or someone like that? 18 MS. LIU: Objection. 19 A. I don't want to speculate but 20 it wasn't within the campaign. 21 Q. Well, as part of your job, who 22 would you reach out to outside of the 23 campaign? 24 A. It says making phone calls and 25 knocking on doors. I believe I had</p>	Page 74	<p>1 BRIDGET LOGAN 2 Q. For the day or for the week? 3 A. For the week. Excuse me. 4 There's not 40 hours in a day. 5 MS. PHILION: Duane, could you 6 please pull up tab 95, please? 7 (Logan Exhibit 5, weekly Excel 8 spreadsheet, Bates 9 MB2020_Wood_00025079 was received 10 and marked on this date for 11 identification.) 12 CONCIERGE: Logan 5 has been 13 marked. 14 Q. Ms. Logan, could you please 15 take a look at this document? And I'll 16 represent to you what you're going to see 17 on the first page is a blank sheet that 18 says "file provided natively". 19 A. Yes. 20 Q. All that means is that the 21 type of document that this is and the way 22 that we produced this document in 23 discovery, we had to indicate that it was 24 produced natively. That's not actually 25 part of the content of the document.</p>	Page 76
<p>1 BRIDGET LOGAN 2 spoke -- reaching out to, I believe I 3 testified earlier about reaching out to 4 somebody within the district that I 5 chose. Otherwise, part of our duties was 6 to try to connect with people within the 7 community. 8 Q. In the third sentence of this 9 email you wrote "but the current schedule 10 does not have a 40 total on it. I am 11 missing about 15 additional hours that 12 could be filled with either being in the 13 office (not sure if that counts) or added 14 hours if canvassing and calls go longer." 15 Do you see that? 16 A. I do see that. 17 Q. What did you mean by "the 18 current schedule does not have a 40 total 19 on it?" 20 A. So ROD Sina asked that we 21 create the schedule for ourselves, which 22 I believe I spoke about earlier, and it 23 needed to have, it looks like, a minimum 24 of 40 hours scheduled for your day for 25 the campaign.</p>	Page 75	<p>1 BRIDGET LOGAN 2 A. Okay. 3 Q. So when I ask you to review 4 this document, I'm asking you to start on 5 page 2. 6 A. Okay. I'm at that page. 7 Q. Could you take a quick flip 8 through the pages to orient yourself with 9 the document, please. 10 A. Okay. 11 Q. Is this an example of the type 12 of schedule that you would populate and 13 send to Sina? 14 A. It is. 15 Q. Each week when you populated 16 the schedule Sina asked you to provide 40 17 hours of work; is that right? 18 A. I don't recall her saying 19 specifically 40 hours. Based on that last 20 email, 40 hours is a good number for the 21 week to use. I don't recall her saying 22 that specifically. 23 Q. And I'm looking at page 2 of 24 the document. 25 A. Yup.</p>	Page 77

<p>1 BRIDGET LOGAN</p> <p>2 Q. So when you were creating a</p> <p>3 schedule you would think about your</p> <p>4 various job duties and then you would</p> <p>5 figure out when in the day you would</p> <p>6 perform certain duties; is that right?</p> <p>7 A. Correct.</p> <p>8 Q. And then you would send this</p> <p>9 document to Sina?</p> <p>10 A. Correct.</p> <p>11 MS. PHILION: Duane, can you</p> <p>12 please pull up tab 94 for me?</p> <p>13 (Logan Exhibit 6, itinerary</p> <p>14 for training, Bates</p> <p>15 MB2020_Wood_00025088 was received</p> <p>16 and marked on this date for</p> <p>17 identification.)</p> <p>18 CONCIERGE: Logan 6 has been</p> <p>19 marked.</p> <p>20 Q. Ms. Logan, can you please take</p> <p>21 a look at Exhibit 6 and let me know if</p> <p>22 you recognize this document?</p> <p>23 A. His name wasn't Felix, it was</p> <p>24 Mortez.</p> <p>25 Am I familiar with the</p>	Page 78	<p>1 BRIDGET LOGAN</p> <p>2 name. Do you recognize their name on this</p> <p>3 document?</p> <p>4 A. I do, Diyab.</p> <p>5 Q. Do you know what this document</p> <p>6 is?</p> <p>7 A. No.</p> <p>8 Q. But you recall seeing it while</p> <p>9 you worked on the campaign?</p> <p>10 A. It looks like a document I saw</p> <p>11 during the campaign.</p> <p>12 Q. It looks to me like an</p> <p>13 introductory document for the St. Anthony</p> <p>14 office. Does that look right to you?</p> <p>15 A. I think that's a good way to</p> <p>16 describe it.</p> <p>17 Q. Did Sina provide you with this</p> <p>18 document?</p> <p>19 A. I don't know who provided me</p> <p>20 with this document specifically.</p> <p>21 Q. On the first page do you see</p> <p>22 where it says, "St. Anthony office hours</p> <p>23 and staff coverage?"</p> <p>24 A. Yes.</p> <p>25 Q. Did you have one day a week</p>	Page 80
<p>1 BRIDGET LOGAN</p> <p>2 document? I was just talking to myself.</p> <p>3 My apologies. I was looking at the</p> <p>4 document and realizing I had forgotten I</p> <p>5 had gotten people's names wrong, so I was</p> <p>6 just under my breath commenting on that.</p> <p>7 Did not mean to not say it out loud.</p> <p>8 Am I familiar with this</p> <p>9 document? Yes.</p> <p>10 Q. So before I ask you questions</p> <p>11 about this document, let's just correct</p> <p>12 what you were just referring to.</p> <p>13 So you said you might have</p> <p>14 gotten someone's name wrong. Could you</p> <p>15 please identify for me who that is?</p> <p>16 A. Mortez. I really wanted his</p> <p>17 name to be Felix, I always called him</p> <p>18 Felix but that was not his name.</p> <p>19 Q. So Mortez is one of the field</p> <p>20 organizers that you worked with and you</p> <p>21 did not work with a Felix; is that right?</p> <p>22 A. Correct.</p> <p>23 Q. Earlier when we were speaking</p> <p>24 you said someone's last name was Ahmed</p> <p>25 but you did not remember their first</p>	Page 79	<p>1 BRIDGET LOGAN</p> <p>2 where you were the person assigned to</p> <p>3 work in the office?</p> <p>4 A. Yes.</p> <p>5 Q. Was your day for the campaign</p> <p>6 Wednesday?</p> <p>7 A. This page says it was. I'm not</p> <p>8 trying to be difficult, I don't recall it</p> <p>9 specifically being Wednesday, but I think</p> <p>10 it's fair to assume it.</p> <p>11 Q. Is it that you don't recall</p> <p>12 one way or the other or you specifically</p> <p>13 recall it being a day other than</p> <p>14 Wednesday?</p> <p>15 A. I don't recall one way or the</p> <p>16 other. It could have been a Thursday. We</p> <p>17 could have switched. Right? This was a</p> <p>18 tentative schedule more likely. I don't</p> <p>19 think that we were supposed to -- at the</p> <p>20 end I don't think there was any one day</p> <p>21 anybody was supposed to be there.</p> <p>22 Q. When you started did you</p> <p>23 generally cover the office one day per</p> <p>24 week?</p> <p>25 A. Yes.</p>	Page 81

<p>1 BRIDGET LOGAN</p> <p>2 Q. And for approximately how many</p> <p>3 weeks do you recall that, being in the</p> <p>4 office one day per week?</p> <p>5 A. For the length of the</p> <p>6 campaign. What was that, four weeks?</p> <p>7 Five weeks?</p> <p>8 Q. And the days you were not the</p> <p>9 person assigned to be in the office, what</p> <p>10 were you doing?</p> <p>11 A. I mean, we can refer back to</p> <p>12 that schedule if you wanted to but any</p> <p>13 number of things related to the campaign,</p> <p>14 in and out of the office, making phone</p> <p>15 calls, canvassing.</p> <p>16 Q. Hosting events?</p> <p>17 A. If it was on the schedule for</p> <p>18 that week.</p> <p>19 Q. Yes?</p> <p>20 A. If it was on the schedule for</p> <p>21 that week, yes.</p> <p>22 Q. It says here there were daily</p> <p>23 team check-ins scheduled from 10:30 to</p> <p>24 11:30. Is that a check-in with your ROD?</p> <p>25 A. That was a team check-in with</p>	Page 82	Page 84
<p>1 BRIDGET LOGAN</p> <p>2 the ROD.</p> <p>3 Q. So you and the other field</p> <p>4 organizers who reported to Sina would</p> <p>5 participate in that call?</p> <p>6 A. We would participate, supposed</p> <p>7 to participate in that call.</p> <p>8 Q. Did you always participate in</p> <p>9 those daily check-ins?</p> <p>10 A. To the best of my</p> <p>11 recollection, yes.</p> <p>12 Q. Approximately how long did the</p> <p>13 daily calls run?</p> <p>14 A. Anywhere from 30 minutes to an</p> <p>15 hour.</p> <p>16 Q. And looking back at your day</p> <p>17 in the office, it says that the office</p> <p>18 hours were 10 a.m. to 8 p.m. on the day</p> <p>19 you were in the office. Is that the</p> <p>20 number of hours you covered the office on</p> <p>21 your day?</p> <p>22 A. Those were the numbers that</p> <p>23 was covered by -- that the campaign</p> <p>24 office was open. There were days that we</p> <p>25 were there earlier.</p>	Page 83	Page 85

<p>1 BRIDGET LOGAN 2 conversation. 3 Q. When you say she gave you 4 suggestions for how to improve, do you 5 recall anything specifically that she 6 said to you? 7 A. I asked her for suggestions. I 8 don't recall any specifics. 9 Q. Do you recall generally the 10 nature of the suggestions? 11 A. Just be confident would be the 12 general nature. 13 Q. Confident in what? 14 A. Confident speaking about the 15 campaign. 16 Q. And you said that you also 17 spoke with Sina about ideas for hosting 18 events. Can you describe the nature of 19 those conversations with Sina? 20 A. The nature of the 21 conversation? 22 Q. Sure. So what do you remember 23 about discussing ideas with her? Did you 24 give her ideas for hosting events? 25 A. It's possible. I mean, I can't</p>	Page 86	Page 88
<p>1 BRIDGET LOGAN 2 -- I don't recall specifics. It's been a 3 couple of years. I know that those 4 conversations were had, I don't remember 5 specifics. 6 Q. I understand. I'm just asking 7 you for your best recollection. 8 A. I know. 9 Q. I understand. I'm just asking 10 for your best recollection. To the extent 11 you have a recollection, I'm just asking 12 you to answer those questions. 13 A. Sure. I don't recall 14 specifics. 15 Q. Underneath the proposed weekly 16 ROD check-in, going back to the exhibit 17 that's in front of you, it says "organize 18 weekly activities and goals." Do you see 19 that? 20 A. I do. 21 Q. And then after it goes through 22 1A through F. Turning to the next page 23 it says, "Including daily and ROD 24 check-ins, this is about 30 hours of 25 work. Spend the remaining 10 hours on</p>	Page 87	Page 89
<p>1 BRIDGET LOGAN 2 activities that help move the lawn 3 signs." 4 Is this consistent with your 5 testimony earlier which is that Sina 6 asked you to schedule 40 hours of work 7 per week? 8 MS. LIU: Objection. 9 Q. You can answer. 10 A. Can you repeat the question? 11 MS. PHILION: Maureen, can you 12 read back the question? 13 (Pending question is read back 14 by the reporter.) 15 A. I don't know how to answer 16 that. Is it consistent? Based on this 17 document, it is. [REDACTED]</p> <p>1 A. Correct. 2 Q. And you would do that for each 3 of the metrics that you were responsible 4 for, that are listed in this document? 5 A. Correct. 6 Q. As a field organizer did you 7 have any involvement in selling campaign 8 merchandise? 9 A. No. 10 Q. Did you have any involvement 11 in ordering any campaign merchandise from 12 manufacturers? 13 A. No. 14 Q. Did you have any involvement 15 in merchandise operations on the campaign 16 website? 17 A. No. 18 Q. So we just talked about two</p>		

23 (Pages 86 - 89)

<p>1 BRIDGET LOGAN</p> <p>2 different types of calls. You talked</p> <p>3 about weekly check-ins with your ROD and</p> <p>4 you testified about daily team check-ins</p> <p>5 with your ROD and field organizers.</p> <p>6 Other than those calls, did</p> <p>7 you attend any other calls for the</p> <p>8 campaign?</p> <p>9 A. As a team?</p> <p>10 Q. I'm just interested in knowing</p> <p>11 any calls for the campaign, other than</p> <p>12 those two types of calls that you</p> <p>13 participated in.</p> <p>14 A. There was, I believe, a weekly</p> <p>15 call from New York's headquarters for the</p> <p>16 campaign that they wanted us to be on.</p> <p>17 There was no reason not to be on it.</p> <p>18 Those I think are the only other phone</p> <p>19 calls as a -- you know, as opposed to</p> <p>20 phone calls with volunteers or phone</p> <p>21 calls with voters, those are the only</p> <p>22 phone calls that I recall having within</p> <p>23 the campaign.</p> <p>24 Q. And these weekly calls that</p> <p>25 you are describing, they occurred</p>	Page 90	Page 92
<p>1 BRIDGET LOGAN</p> <p>2 approximately once per week?</p> <p>3 A. To the best of my</p> <p>4 recollection.</p> <p>5 Q. Who do you recall speaking on</p> <p>6 those calls?</p> <p>7 A. I recall Kevin, who was the</p> <p>8 campaign, like, the campaign manager guy.</p> <p>9 I don't recall his last name. I recall</p> <p>10 another voice, like, saying "here is</p> <p>11 Kevin", but I don't recall who that was.</p> <p>12 I recall other people being on the call.</p> <p>13 I don't recall who they were. I just</p> <p>14 remember Kevin.</p> <p>15 Q. What was the general content</p> <p>16 or subject matter of the calls that you</p> <p>17 participated in?</p> <p>18 A. They felt like weekly updates</p> <p>19 as to how things were going nationwide.</p> <p>20 Q. Did you speak on any of these</p> <p>21 calls?</p> <p>22 A. No, I did not.</p> <p>23 Q. Do you recall hearing anyone</p> <p>24 from within the Minnesota campaign team</p> <p>25 speaking on any of these calls?</p>	Page 91	Page 93

24 (Pages 90 - 93)

<p>1 BRIDGET LOGAN 2 were going to host an event? 3 A. Yes. 4 Q. And then turning to Logan 5 Exhibit 9, is this another event that you 6 tried to plan? 7 A. Correct. 8 Q. Did this event come to 9 fruition? 10 A. I don't think so. 11 Q. Do you have any specific 12 recollection as to why? 13 A. No specific recollection as to 14 why. 15 Q. In looking at the last three 16 exhibits that we just reviewed and these 17 turnout plans, is this the kind of 18 planning that you would talk to your ROD 19 about on your weekly check-ins? 20 A. Yes. 21 Q. Was one of your job duties to 22 recruit volunteers for the campaigns? 23 A. Yes. 24 Q. Approximately how many 25 volunteers did you recruit during the</p>	Page 102	<p>1 BRIDGET LOGAN 2 A. If that means the same thing, 3 on behalf of the campaign. 4 Q. It's your testimony, so you 5 tell me if it means the same thing to 6 you. That's what I'd like to know. 7 A. It's not the terminology I 8 would use. 9 Q. What terminology would you 10 use? 11 A. Campaign on behalf of the 12 campaign. 13 Q. What was the objective of the 14 campaign? 15 A. To get Mike Bloomberg -- to 16 get Mike Bloomberg into the presidency. I 17 can't think of the correct word right 18 now. Elected. 19 Q. How did you recruit 20 volunteers? 21 A. When I would phone bank, when 22 I would make phone calls I believe the 23 two volunteers kind of fell into my lap. 24 They walked in. 25 Q. They walked into the office?</p>	Page 104
<p>1 BRIDGET LOGAN 2 course of the campaign? 3 A. Maybe two. 4 Q. And what did you recruit these 5 volunteers to do? 6 A. To make phone calls. To come 7 into our office to make phone calls. 8 Q. And when you say to come into 9 your office to make phone calls, you were 10 recruiting them to make phone calls to 11 advocate for Mr. Mike Bloomberg's 12 candidacy for the presidency; is that 13 right. 14 A. I apologize. Can you repeat 15 that? 16 Q. Sure. So when you were 17 recruiting volunteers to make calls, were 18 you recruiting them to make calls to 19 engage in political advocacy for 20 Mr. Bloomberg? 21 A. I was recruiting them to make 22 phone calls on behalf of the campaign, 23 yes. 24 Q. To support Mr. Bloomberg's 25 candidacy for the president?</p>	Page 103	<p>1 BRIDGET LOGAN 2 A-hum. Yes. 3 Q. I think earlier you said one 4 volunteer that you recall her name was 5 Eileen, is that one of the volunteers you 6 were referring to? 7 A. No. No. I didn't see her as a 8 volunteer, I saw her as someone who 9 wanted to host a house party. I don't see 10 that as the same thing. 11 Q. What do you see someone who 12 wanted to host a house party as? 13 A. I see someone who wanted to 14 host a house party as someone who already 15 was a Bloomberg supporter and wanted to 16 create a space to encourage other people 17 to vote for Mike Bloomberg. 18 Q. How is that different than the 19 other volunteers that you recruited? 20 A. She really didn't do what I 21 would call the active, which would make 22 -- she didn't do phone calls and she 23 didn't canvass. She just created a space 24 where someone from the campaign could 25 come and talk about Mike Bloomberg</p>	Page 105

27 (Pages 102 - 105)

<p>1 BRIDGET LOGAN 2 campaign, presidential campaign. What 3 that specifically would be, I don't know. 4 I don't recall. 5 Q. Do you recall having any sort 6 of parameters around what you were 7 looking for? 8 A. No. You know, we were adults, 9 we were hired as field organizers for a 10 campaign and they -- you know, they gave 11 us scripts to use. They didn't give us 12 specifics on what type of groups to reach 13 out to. 14 Q. So you selected the types of 15 groups that you wanted to reach out to? 16 MS. LIU: Objection. 17 Q. You can answer. 18 A. In this particular instance, 19 yes. 20 MS. PHILION: Duane, could you 21 please pull up tab 69? 22 (Logan Exhibit 11, email dated 23 February 10, 2020, Bates 24 MB2020_Wood_000148487 was received 25 and marked on this date for </p>	Page 114	<p>1 BRIDGET LOGAN 2 Q. If you know, what is the 3 relationship between the Minnesota DFL 4 and the National Democratic Party, if 5 there is one? 6 A. I don't know. I don't know. 7 Q. Do you understand the DFL to 8 be the Democratic party of Minnesota? 9 A. Yes, or the MN DFL, yes. 10 Q. Why did you reach out to 11 Mr. Mills? 12 A. To talk about the campaign. 13 Q. Is he another person that you 14 identified through your research? How did 15 you find Mr. Mills? 16 A. On the internet. 17 Q. And do you have a specific 18 recollection of why you reached -- you 19 made the decision to reach out to 20 Mr. Mills, in particular? 21 A. Probably because Mike 22 Bloomberg was running on that ticket and 23 I felt that this would be a good 24 connection to make, on the Democratic 25 ticket. </p>	Page 116
<p>1 BRIDGET LOGAN 2 identification.) 3 CONCIERGE: Logan 11 has been 4 marked. 5 Q. Ms. Logan, could you please 6 take a look at Exhibit 11 and let me know 7 if you recognize this email? 8 A. Yeah, I do recognize the 9 email. 10 Q. This is an email from you to 11 someone name Marcus Mills on Monday, 12 February 10th, 2020. 13 Is Mr. Mills the gentleman 14 that you referenced a few minutes ago 15 that you reached out or is Mr. Mills 16 someone different? 17 A. Mr. Mills is someone 18 different. 19 Q. Do you know who Mr. Mills is? 20 A. According to this email it 21 looks like he has some position within 22 the Minnesota DFL. 23 Q. What is the Minnesota DFL? 24 A. Minnesota Democratic Farm and 25 Labor Party. </p>	Page 115	<p>1 BRIDGET LOGAN 2 Q. While you were working for the 3 campaign, did you attend any events that 4 were happening within the community? 5 A. No. 6 Q. Was that something that you 7 were looking to do while you were working 8 for the campaign? 9 A. Not that I recall. 10 MS. PHILION: Duane, could you 11 please pull up tab 64? 12 (Logan Exhibit 12, email dated 13 February 5, 2020, Bates 14 MB2020_Wood_00014649 was received 15 and marked on this date for 16 identification.) 17 CONCIERGE: Logan 12 has been 18 marked. 19 Q. Ms. Logan, could you please 20 review the exhibit that's been marked as 21 Logan 12 and let me know if you recognize 22 it? 23 A. Oh, there's more pages. Give 24 me a moment. 25 Q. Take your time. </p>	Page 117

30 (Pages 114 - 117)

<p>1 BRIDGET LOGAN 2 that right? 3 A. Correct. 4 Q. And then caucus-goers would 5 have the opportunity to speak with you 6 about your candidates, who in this case 7 was Mike Bloomberg; is that right? 8 A. Correct. 9 Q. And in terms of the 10 conversations that you had with caucus 11 goers, was your approach similar to when 12 you stood up and provided remarks to the 13 group? 14 A. I'd never really had to 15 provide remarks. If anybody engaged with 16 me they were looking to engage with me 17 and so they approached me and they asked 18 me questions. 19 Q. Sorry. Let me clarify. A few 20 minutes ago you said that there was an 21 opportunity to provide remarks to the 22 group. I'm just asking you when you 23 described your approach to how you 24 handled that, I'm asking you in the 25 one-on-one conversations you had was your</p>	Page 126	<p>1 BRIDGET LOGAN 2 with them to try to change their minds? 3 A. I talked to them about what 4 they provided for us to talk about for 5 talking points based on whatever topic 6 they brought up. I don't remember 7 specific topics or policies wanting to be 8 discussed with people who approached me. 9 Q. Did you do that with the 10 objective of them -- of trying to get 11 them to think differently about 12 Mr. Bloomberg and his campaign? 13 A. Since I wanted Mike Bloomberg 14 to win the candidacy for the DFL, I think 15 it's fair to say that whatever I 16 specifically said to them was to put Mike 17 Bloomberg in a positive light. 18 Q. Thank you. So it's a little 19 bit after 12:45. So I think now is a good 20 time to take a short lunch break. If 21 you're comfortable with a half hour, 22 that's what I propose. 23 A. Half hour works for me. 24 Q. Great. We'll round up. Let's 25 say we plan to meet back here at 1:20</p>	Page 128
<p>1 BRIDGET LOGAN 2 approach similar in terms of what you 3 were saying and how you were 4 communicating? 5 A. Maybe I didn't convey this 6 well enough. I didn't have an approach 7 when people approached me. You know what 8 I mean? They were usually looking for 9 something specific. They were usually 10 coming to me, rather than me coming to 11 them, so I didn't have to have an 12 approach. Excuse me. 13 Q. Were they coming to you about 14 particular issues that were important to 15 them? 16 A. I only giggle because most of 17 the time when people approached me about 18 Mike Bloomberg it felt more of, like, an 19 attack. So it was more of -- like, it was 20 more about how they felt about Mike 21 Bloomberg and why they felt he wasn't a 22 good candidate. There wasn't at these 23 caucuses a positive engagement for the 24 campaign. 25 Q. Did you provide information</p>	Page 127	<p>1 BRIDGET LOGAN 2 Eastern. 3 A. I can work with that. 4 VIDEOGRAPHER: Very well. We 5 are going off the record at 11:48 6 a.m. Central Time. 7 (Lunch recess is taken.) 8 VIDEOGRAPHER: We are going 9 back on the record at 12:23 p.m. 10 Central Time. 11 Q. Ms. Logan, in 2020 Minnesota 12 was a Super Tuesday state; is that 13 correct? 14 A. Correct. 15 Q. And Super Tuesday in 2020 was 16 March 3rd, 2020; is that right? 17 A. I believe so, yes. 18 Q. What was your last day of work 19 for the campaign? 20 A. March 3rd, where specifically 21 did anything regarding the campaign. 22 Q. You were paid by the campaign 23 through March 31st, 2020; is that 24 correct? 25 A. I thought it was through</p>	Page 129

33 (Pages 126 - 129)

<p>1 BRIDGET LOGAN 2 April. 3 Q. Okay. But you recall being 4 paid by the campaign through a date after 5 you stopped working for the campaign? 6 A. Where I stopped doing anything 7 for the campaign, correct. 8 Q. Did you elect to continue your 9 health insurance from the campaign 10 through November 2020? 11 A. No, I did not. 12 Q. Did you decide not to continue 13 your health coverage because you had 14 resumed employment with Minnetonka? 15 A. That probably would have been 16 the biggest factor. 17 Q. So based on your testimony 18 today, is it fair to say that you worked 19 for the campaign for four weeks in total, 20 if your start date was February 3rd, 2020 21 and your last day of work was March 3rd, 22 2020? 23 A. Yes. 24 Q. When you worked in the St. 25 Anthony office you testified that you</p>	Page 130	<p>1 BRIDGET LOGAN 2 with Wes, you canvassed with him a couple 3 of times during the course of the 4 campaign? 5 A. Yes, I believe it was like the 6 very first two times we canvassed. I 7 think the reason for that was to get us 8 both used to doing it. And then -- so, 9 yeah, that was with Wes. 10 Q. When did you start with 11 LaTonya? 12 A. Later, but within our 13 district. Specific dates, I don't know. 14 Prior to March 3rd. 15 Q. Approximately how many times 16 did you canvass with LaTonya? 17 A. That was another two days. 18 Q. Other than the four days total 19 that you canvassed with Wes and LaTonya, 20 did you otherwise canvass on your own? 21 A. Yes. 22 Q. You also phone banked when you 23 worked in the St. Anthony office; is that 24 right? 25 A. Correct.</p>	Page 132
<p>1 BRIDGET LOGAN 2 spent some of your time canvassing? 3 A. Yes. 4 Q. When you canvassed, did you do 5 that on your own? 6 A. Yes and no. 7 Q. So explain that to me? 8 A. There were some instances 9 where in the beginning I did canvass with 10 another field organizer, and that was 11 Wes, and he was out of our office, and we 12 did that a couple of times and then after 13 that I canvassed on my own. 14 Q. Other than canvassing with Wes 15 a couple of times -- 16 A. Oh, I take that back. I'm so 17 sorry. I didn't mean to interrupt. I also 18 -- can I add? 19 Q. You can add, yes. 20 A. Okay. Sorry about that. I also 21 canvassed with LaTonya (sic) out of our 22 office at another time. 23 Q. I'm going to take those one at 24 a time. 25 So starting when you canvassed</p>	Page 131	<p>1 BRIDGET LOGAN 2 Q. Did you phone bank on your 3 own? 4 A. There was always somebody 5 there. I mean, I wasn't on the phone with 6 any other field organizer. I made the 7 phone calls on my own with other people 8 in the room. 9 Q. Were the other people in room 10 listening to your phone calls or were you 11 listening to their phone calls or you are 12 you were physically in the same room? 13 A. We were physically in the same 14 room. No one was listening in on my 15 calls. 16 Q. Other than your testimony on 17 events that you described today, did you 18 ever attend any events with other members 19 of the Bloomberg Campaign? 20 A. Yes. There was a debate night 21 and so there was a party held at the 22 Minnesota headquarters in Minneapolis, 23 and there were other field organizers and 24 other members of the campaign, the 25 Minnesota campaign there.</p>	Page 133

<p>1 BRIDGET LOGAN</p> <p>2 Q. That event was to watch the</p> <p>3 debate with other members of the</p> <p>4 campaign?</p> <p>5 A. Yes. And other people were</p> <p>6 invited outside, outside of the campaign.</p> <p>7 So it was, along with voters, it was an</p> <p>8 event held for Bloomberg supporters and</p> <p>9 then to watch the debate together.</p> <p>10 Q. Other than the debate event,</p> <p>11 did you attend any other events with</p> <p>12 other members of the Bloomberg Campaign?</p> <p>13 A. Super Tuesday there was -- at</p> <p>14 Surly Brewery in Minneapolis, they had</p> <p>15 rented out a spot for the field</p> <p>16 organizers and anybody else who was out</p> <p>17 on Super Tuesday on behalf of the</p> <p>18 campaign. I believe there were other</p> <p>19 people outside of field organizers that</p> <p>20 were working on this thing.</p> <p>21 Q. Was this a social event or a</p> <p>22 voter engagement event?</p> <p>23 A. It was an event to watch the</p> <p>24 numbers come in after Super Tuesday. I</p> <p>25 don't know what you would call that.</p>	Page 134	<p>1 BRIDGET LOGAN</p> <p>2 Q. Same question with respect to</p> <p>3 Wes, were you going door to door together</p> <p>4 or were you working in the same area but</p> <p>5 going to different doors?</p> <p>6 A. We did a mixture of both.</p> <p>7 MS. PHILION: Duane, could you</p> <p>8 please pull up tab 30?</p> <p>9 (Logan Exhibit 14, Offer</p> <p>10 Letter, Notice of Acknowledgement</p> <p>11 of Pay Rate and Pay Day,</p> <p>12 Confidentiality Agreement,</p> <p>13 Prevention and Coordination Policy</p> <p>14 and Code of Conduct, Bates</p> <p>15 MB2020_Wood_00036909 was received</p> <p>16 and marked on this date for</p> <p>17 identification.)</p> <p>18 CONCIERGE: Logan 14 has been</p> <p>19 marked.</p> <p>20 Q. Ms. Logan, could you please</p> <p>21 review Exhibit 14 and let me know if you</p> <p>22 recognize this type of document?</p> <p>23 A. I do recognize this document.</p> <p>24 Q. Do you recognize this as the</p> <p>25 offer letter packet that you signed when</p>	Page 136
<p>1 BRIDGET LOGAN</p> <p>2 Q. Any other events that you</p> <p>3 attended with other members of the</p> <p>4 Bloomberg Campaign?</p> <p>5 A. Not that I recall.</p> <p>6 Q. Going back to the canvassing</p> <p>7 that you did with Wes and LaTonya, for</p> <p>8 each one of those canvassing events,</p> <p>9 approximately how much time did you spend</p> <p>10 with each of those organizers when you</p> <p>11 were canvassing?</p> <p>12 A. I believe with Wes it was</p> <p>13 approximately three hours each time and</p> <p>14 then with LaTonya it was over the course</p> <p>15 of a day. We would canvass, because it</p> <p>16 was cold out, go back, get warmed up, go</p> <p>17 back out and canvass. I don't know if I</p> <p>18 could put a specific number on that.</p> <p>19 Q. Were you going door to door</p> <p>20 together or were you working in the same</p> <p>21 area but going to separate homes?</p> <p>22 A. LaTonya and I?</p> <p>23 Q. Yes.</p> <p>24 A. We were working together door</p> <p>25 to door.</p>	Page 135	<p>1 BRIDGET LOGAN</p> <p>2 you joined the Bloomberg Campaign?</p> <p>3 A. Gosh, way back in January,</p> <p>4 that far. Sorry, I was just noting the</p> <p>5 date and I don't recall it being that far</p> <p>6 into January, but I recall reading this</p> <p>7 and signing this.</p> <p>8 Q. The campaign paid you a</p> <p>9 semi-monthly salary of \$3,000; is that</p> <p>10 correct?</p> <p>11 A. That is correct.</p> <p>12 Q. And turning to the page that</p> <p>13 has a Bates number that ends in diction</p> <p>14 910, which is the second page of the</p> <p>15 document you're looking at, can you</p> <p>16 please look at that page and confirm for</p> <p>17 me that you electronically signed this</p> <p>18 document on January 20th, 2020?</p> <p>19 A. I did electronically sign this</p> <p>20 document on January 20th, 2020.</p> <p>21 Q. Looking at the page of Bates</p> <p>22 number 36911, which is the third page in</p> <p>23 the packet, do you see the Notice of</p> <p>24 Acknowledgment of Pay Rate and Pay Day?</p> <p>25 A. I do see the acknowledgment.</p>	Page 137

<p>1 BRIDGET LOGAN 2 A. No, I do not. 3 Q. Looking at your response to 4 interrogatory 12, so this is an 5 interrogatory in which we asked you to 6 identify any individuals that you believe 7 have relevant facts, other than 8 individuals you identified in response to 9 other interrogatories, so a catch-all, if 10 I may. So here you listed five people 11 and then two categories of people, so I 12 want to go over that. 13 So the first person you listed 14 was Michael Bloomberg. Have you ever had 15 any interactions with Mr. Bloomberg? 16 A. No, I have not. 17 Q. Next person you listed was 18 Kevin Sheekey. Have you ever had any 19 interactions with Mr. Sheekey? 20 A. I was on a phone call with him 21 but he did not call me specifically. 22 Q. What phone call were you on 23 with Mr. Sheekey? 24 A. There was those weekly phone 25 calls from the campaign headquarters in</p>	Page 162	<p>1 BRIDGET LOGAN 2 Q. Yes, starts on top of page 14 3 and your response is also on page 14. 4 A. Okay. 5 Q. This interrogatory asked you 6 to provide a calculation of your damages. 7 Do you see that? 8 A. Yes. 9 Q. In the second sentence of your 10 response to this interrogatory it states, 11 "Subject to and notwithstanding these 12 objections, Plaintiff seeks damages in 13 the amount of lost income and benefits 14 plus unreimbursed business expenses." Do 15 you see that? 16 A. I do. 17 Q. Are there any expenses for 18 which you claim the campaign owes you 19 money? 20 A. I did pay for out-of-pockets, 21 beverages and food for the sort of event 22 that I held here at my home. Those would 23 be the out-of-pocket expenses that I 24 would be looking for. 25 Q. Did you submit receipts for</p>	Page 164
<p>1 BRIDGET LOGAN 2 New York. 3 Q. Outside of those phone calls, 4 any interactions with Mr. Sheekey? 5 A. No. 6 Q. Tim O'Brien, have you ever had 7 any communications with Tim O'Brien? 8 A. No. 9 Q. Do you know who Mr. O'Brien 10 is? 11 A. No. 12 Q. Do you know who Dan Kanninen 13 is? 14 A. No. 15 Q. Ever had any communications 16 with Mr. Kanninen? 17 A. No. 18 Q. Do you know who Katherine 19 Whelan is? 20 A. No. Do I? No. 21 Q. Can you please turn to 22 interrogatory 16? 23 A. Which number? 24 Q. 16. 25 A. One-six?</p>	Page 163	<p>1 BRIDGET LOGAN 2 that event to the campaign for 3 reimbursement? 4 A. I don't recall. 5 Q. You don't recall one way or 6 the other or don't recall submitting 7 them? 8 A. I don't recall. They might 9 have asked but I don't recall if I 10 submitted them or not. 11 Q. Are you familiar with Concur? 12 A. The word "concur"?" 13 Q. No, the expense reporting 14 system Concur. 15 A. No. 16 Q. During your employment with 17 the campaign do you recall creating a 18 Concur account for yourself? 19 A. No. 20 Q. Do you recall ever submitting 21 receipts to be processed for 22 reimbursement in Concur? 23 A. Not that I recall. 24 Q. Do you have any specific 25 recollection of reaching out to anyone on</p>	Page 165

<p style="text-align: right;">Page 186</p> <p>1 BRIDGET LOGAN 2 another if you ever may have posted about 3 Mr. Bloomberg or the campaign or you 4 specifically know that it didn't happen? 5 A. I don't recall one way or the 6 other. 7 Q. And that would go for 8 Facebook, Instagram, Twitter and Reddit? 9 A. That would go for any of the 10 four that we have said, yes. 11 Q. Okay. So we'll follow up in 12 writing with your counsel but I am going 13 to ask that you conduct a search for any 14 documents that are responsive to the 15 request that the campaign has made of you 16 in this lawsuit. 17 (Request for document 18 production.) 19 MS. PHILION: And I think with 20 that, I don't have any further 21 questions for today. 22 THE WITNESS: Okay. 23 MS. PHILION: Thank you. 24 THE WITNESS: You're welcome. 25 MS. LIU: I'm going to have a</p>	<p style="text-align: right;">Page 188</p> <p>1 BRIDGET LOGAN 2 A. I did. 3 Q. Do you remember about how many 4 hours a week you worked? 5 MS. PHILION: Objection. 6 A. It could be anywhere from 40 7 to 70. It depended upon the day. There 8 were days that -- or weeks that were 9 definitely more than 40. 10 Q. You also testified earlier 11 today that you had never canvassed 12 outside of Minnesota. Do you recall that 13 testimony? 14 MS. PHILION: Objection. 15 A. Yes. I have never canvassed 16 outside the State of Minnesota. 17 Q. Do you recall if any field 18 organizers outside the State of Minnesota 19 ever canvassed in Minnesota? 20 MS. PHILION: Objection. 21 A. They did. We had some 22 canvassers in the State of Wisconsin come 23 and help, I think it was during that Get 24 Out The Vote weekend in the Hopkins 25 office.</p>
<p style="text-align: right;">Page 187</p> <p>1 BRIDGET LOGAN 2 few questions. Do you mind if we 3 take a five minute break and then 4 come back? 5 MS. PHILION: Five minutes, 6 sure. 7 VIDEOGRAPHER: Very well. We 8 are going off the record at 1:43 9 Central Time. 10 (Recess is taken.) 11 VIDEOGRAPHER: We are going 12 back on the record at 1:48 p.m. 13 Central Time. 14 CROSS-EXAMINATION BY MS. LIU: 15 Q. Ms. Logan, you testified 16 earlier today about the proposed schedule 17 that you submitted to your ROD, Sina 18 Black, who requested you to schedule 40 19 hours of work. Do you recall that 20 testimony? 21 MS. PHILION: Objection. 22 A. I do. 23 Q. Did you work more than 40 24 hours a week? 25 MS. PHILION: Objection.</p>	<p style="text-align: right;">Page 189</p> <p>1 BRIDGET LOGAN 2 Q. Okay. Ms. Logan, what were 3 your primary job duties as a field 4 organizer for the Bloomberg Campaign? 5 MS. PHILION: Objection. 6 A. I was to call people on the 7 phone and talk to them about the 8 campaign, I was to -- door to door I 9 canvassed -- made phone calls and 10 canvassed, canvassed to get a feel for 11 who was a Bloomberg supporter. 12 Q. And as a field organizer with 13 the Bloomberg Campaign, did the campaign 14 require you to collect information from 15 voters that you were contacting? 16 A. Yes. 17 Q. What information were you 18 collecting? 19 A. I collected if they were at 20 home, their gender, collected if they 21 even answered the phone, collected if 22 they stated who they were going to be 23 voting for, if it wasn't Mike Bloomberg. 24 Not everybody answered those questions on 25 the phones or at the doors.</p>

<p>1 BRIDGET LOGAN</p> <p>2 Q. And if you were phone banking,</p> <p>3 would you be collecting this information</p> <p>4 during the course of a phone call?</p> <p>5 MS. PHILION: Objection.</p> <p>6 A. Yes. And afterwards you had</p> <p>7 to state if they answered or not and then</p> <p>8 if you did end up having a conversation,</p> <p>9 what was it that you ended up talking</p> <p>10 about.</p> <p>11 Q. And so as you were collecting</p> <p>12 this information during the phone call,</p> <p>13 were you inputting it into some system at</p> <p>14 the same time?</p> <p>15 MS. PHILION: Objection.</p> <p>16 A. Yes.</p> <p>17 Q. And when you were using that</p> <p>18 system were you doing it, putting the</p> <p>19 information you were getting -- strike</p> <p>20 that.</p> <p>21 Would you report the data you</p> <p>22 collected from voters back to the</p> <p>23 campaign?</p> <p>24 MS. PHILION: Objection.</p> <p>25 A. Say that again.</p>	Page 190	Page 192
<p>1 BRIDGET LOGAN</p> <p>2 Q. Would you report the data that</p> <p>3 you collected from voters in the system</p> <p>4 in the phone call back to the campaign?</p> <p>5 MS. PHILION: Objection.</p> <p>6 A. If the campaign had access to</p> <p>7 that information then, yes, it was given</p> <p>8 to them. I never had to directly</p> <p>9 communicate to the campaign that</p> <p>10 information.</p> <p>11 Q. Okay. And you also mentioned</p> <p>12 earlier in your testimony that you were</p> <p>13 also collecting some information after a</p> <p>14 phone call. How did you do that?</p> <p>15 MS. PHILION: Objection.</p> <p>16 A. Collect some information after</p> <p>17 a phone call? There was spots, right, you</p> <p>18 would hang up and they would be, like,</p> <p>19 how did the phone call go, if I recall.</p> <p>20 And once again, was it at home, if you</p> <p>21 did get a chance to talk to them, you</p> <p>22 know, what did you guys talk about, if</p> <p>23 anything? They asked if they -- you know,</p> <p>24 they stated if they were going to vote</p> <p>25 for Bloomberg or not.</p>	Page 191	Page 193

<p style="text-align: right;">Page 194</p> <p>1 BRIDGET LOGAN 2 collected while you were canvassing, was 3 this information similar to the 4 information you collected while you were 5 phone banking?</p> <p>6 MS. PHILION: Objection.</p> <p>7 A. I think that's fair to say.</p> <p>8 Q. And did you also report this 9 data that you collected while canvassing 10 back to the campaign?</p> <p>11 MS. PHILION: Objection.</p> <p>12 A. If they were looking at those 13 systems after the fact or while I was 14 doing it, then that's how they got their 15 information. I never directly was in 16 contact with the campaign with this 17 information --</p> <p>18 Q. Okay.</p> <p>19 A. -- from phone banking or 20 canvassing.</p> <p>21 Q. And similarly, did you input 22 this data into the system in realtime as 23 you were talking to voters, while 24 canvassing?</p> <p>25 MS. PHILION: Objection.</p>	<p style="text-align: right;">Page 196</p> <p>1 BRIDGET LOGAN 2 counsel?</p> <p>3 MS. PHILION: Off the record.</p> <p>4 VIDEOGRAPHER: We're now going 5 off the record at 1:56 p.m. Central 6 Time and this concludes today's 7 testimony given by Bridgette Logan.</p> <p>8 The total number of Media Units 9 used was 5 and will be retained by 10 Veritext Legal Solutions.</p> <p>11 Thank you very much and have a 12 great day.</p> <p>13 (The proceedings were 14 adjourned at 1:56 p.m. Central 15 Time)</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
<p style="text-align: right;">Page 195</p> <p>1 BRIDGET LOGAN 2 A. Yes.</p> <p>3 MS. LIU: I have no further 4 questions.</p> <p>5 MS. PHILION: I just have a 6 couple of followups.</p> <p>7 REDIRECT EXAMINATION BY MS. PHILION:</p> <p>8 Q. Ms. Logan, did you talk to 9 your attorney on the last break that we 10 took?</p> <p>11 A. That last five-minute break?</p> <p>12 Q. Yes.</p> <p>13 A. No.</p> <p>14 Q. Did you talk to your attorney 15 on any of the other breaks that we've 16 taken today?</p> <p>17 A. Yes.</p> <p>18 Q. And in any of those other 19 breaks where you talked to your attorney, 20 did you talk to her about the substance 21 of your testimony today?</p> <p>22 A. No.</p> <p>23 MS. PHILION: Thank you.</p> <p>24 VIDEOGRAPHER: Very well. Am 25 I good to take us off the record,</p>	<p style="text-align: right;">Page 197</p> <p>1 C E R T I F I C A T E 2 I, MAUREEN M. RATTO, a 3 Registered Professional Reporter, do 4 hereby certify that prior to the 5 commencement of the examination, 6 BRIDGET LOGAN was sworn by me to 7 testify the truth, the whole truth and 8 nothing but the truth.</p> <p>9 I DO FURTHER CERTIFY that the 10 foregoing is a true and accurate 11 transcript of the proceedings as taken 12 stenographically by and before me at 13 the time, place and on the date 14 hereinbefore set forth.</p> <p>15 I DO FURTHER CERTIFY that I am 16 neither a relative nor employee nor 17 attorney nor counsel of any of the 18 parties to this action, and that I am 19 neither a relative nor employee of such 20 attorney or counsel, and that I am not 21 financially interested in this action.</p> <p>22</p> <p>23</p> <p>24 <i>Maureen Ratto</i></p> <p>25 MAUREEN M. RATTO, RPR License No. 817125</p>

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